

Dooley Roberts & Fowler LLP
Suite 201, Orlean Pacific Plaza
865 South Marine Corps Drive
Tamuning, Guam 96913
Telephone (671) 646-1222
Facsimile (671) 646-1223

FILED
DISTRICT COURT OF GUAM

OCT - 4 2007

JEANNE G. QUINATA
Clerk of Court

Attorneys for Defendant LeoPalace Resort

IN THE DISTRICT COURT

OF GUAM

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,) CASE NO. 1:06-CV-00028
)
Plaintiff,)
vs.)
LEO PALACE RESORT,)
)
Defendant.) MOTION TO FILE PSYCHOTHERAPY RECORDS UNDER THE SEAL OF THE COURT
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JENNIFER HOLBROOK,)
VIVIENE VILLANUEVA and)
ROSEMARIE TAIMANGLO,)
)
Plaintiff-Intervenors,)
vs.)
MDI GUAM CORPORATION dba LEO PALACE RESORT MANENGGON HILLS)
and DOES 1 through 10,)
)
Defendants.)
)

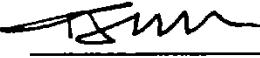
COMES NOW Defendant Leopalace Resort, through counsel, Dooley Roberts & Fowler LLP, by Tim Roberts, Esq., and hereby respectfully moves for a court order permitting it to file Plaintiff-Intervenors' recently-obtained psychotherapy records under the seal of this Court.

Motion to File Psychotherapy Records
Under the Seal of the Court
EEOC v. LeoPalace Resort
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Leopalace notes that the Court's September 14, 2007 Order compelling the production of Plaintiff-Intervenors' psychotherapy records did not place any limits on Leopalace's use of the documents. Nonetheless, the records contain sensitive and personal information that ordinary people would not want revealed to the public. Leopalace notes, however, that psychotherapy records made the subject of this motion are necessary for Leopalace's use in connection with the pending motion for partial summary judgment. Accordingly, portions of those records have been cited to in Leopalace's reply brief.

Dated this 3rd day of October, 2007.

DOOLEY ROBERTS & FOWLER LLP

By 
TIM ROBERTS
Attorneys for Defendant

F:\Documents\Thomas L Roberts (07.04)\M108\M108.330 EEOC\Pleadings\M108-330.Psych Records-Motion